## SUPREME COURT OF THE UNITED STATES

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THE ERISA INDUSTRY COMMITTEE,	
Petitioner,	
v.	
CITY OF SEATTLE, WASHINGTON,	
Respondent.	
CERTIFICATE OF WORD COUNT	

As required by Supreme Court Rule 33.1(h), I certify that the document contains 5,423 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 18th day of February 2022.

Noel Reyes

Sworn to and subscribed before me this 18th day of February 2022.

MARIANA BRAYLOVSKIY

Notary Public State of New York

Mariana Braylovsb

No. 01BR6004935

Qualified in Richmond County

Commission Expires March 30, 2022

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